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MICHAEL SIFEN

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEVADA**

MICHAEL J. MONA, JR., an individual,

Plaintiff,

vs.

MICHAEL SIFEN, an individual,

Defendant.

CASE NO. 2:22-cv-00821-CDS-VCF

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE REPLY IN
SUPPORT OF DEFENDANT'S
MOTION TO DISMISS COMPLAINT
[ECF NO. 5]**

(FIRST REQUEST)

Defendant, MICHAEL SIFEN ("Sifen"), by and through his counsel of record, Matthew T. Dushoff, Esq., and William A. Gonzales, Esq., of the law firm of Saltzman Mugan Dushoff and Plaintiff, MICHAEL J. MONA, JR. ("Mona"), by and through his counsel of record Liane K. Wakayama, Esq., Dale A. Hayes, Jr., Esq., and Jeremy D. Holmes, Esq., of the law firm of Hayes Wakayama, hereby stipulate as follows:

1. On July 19, 2022, Sifen filed his Motion to Dismiss Plaintiff's Complaint [ECF No. 5] ("Motion to Dismiss");
2. Mona's Response to Sifen's Motion to Dismiss [ECF No. 12] was filed on August 16, 2022;
3. This is the first request for an extension of this deadline. This request for an extension is made by the parties in good faith and is not meant for purposes of delay or prejudice to any party;

4. This extension is required to give Sifen an adequate amount of time to respond to Mona's Opposition, which was approximately 54 pages in length.

5. Mona has agreed to give Sifen up through and including September 15, 2022, in which to file a reply in support of his Motion to Dismiss Complaint;

6. There are no other deadlines that are affected by this stipulation and proposed order that are presently known to the parties;

7. This is the first stipulation and is not entered for any improper purpose or to delay.

8. Therefore, the Parties hereby stipulate and agree that Sifen has up through and including September 15, 2022, in which to file a reply in support of his Motion to Dismiss Complaint.

DATED this 17th day of August, 2022.

SALTZMAN MUGAN DUSHOFF

By /s/ William A. Gonzales
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Attorneys for Defendant
MICHAEL SIFEN

DATED this 17th day of August, 2022.

HAYES | WAKAYAMA

By /s/ Liane K. Wakayama
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Attorneys for Plaintiff
MICHAEL J. MONA, JR.

ORDER

IT IS SO ORDERED.


UNITED STATES DISTRICT JUDGE

DATED: August 24, 2022

Michael J. Mona, Jr. v. Michael Sifen / 2:22-cv-00821-CDS-VCF
Stipulation and Order to Extend Time to File Reply in Support of Defendant's Motion to Dismiss Complaint